

JAMES P. KEMP, ESQUIRE
Nevada Bar No. 006375
KEMP & KEMP, ATTORNEYS AT LAW
7435 W. Azure Drive, Suite 110,
Las Vegas, NV 89130
(702) 258-1183/(702) 258-6983 (fax)
jp@kemp-attorneys.com
Attorney for Plaintiff Julie Hanna

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

9 JULIE HANNA, } Case No.: 2:21-cv-00639-JCM-BNW
10 Plaintiff, }
11 vs. } Stipulation and Order to Extend Deadline for
12 K-KEL, INC.. a Nevada Corporation; DOES I- Response and Reply to Defendants Mark
X; ROE Business Entities I-X; Mark } Broadhurst's and Chase Swanson's Motions to
13 Broadhurst; Mike York; and Chase Swanson, } Dismiss (ECF No. 60 + 61)
14 Defendants. } [Second Request]
15 }

Pursuant to Local Rule 6-1, Defendant K-Kel, Inc. (“Defendant”) and Plaintiff Julie Danou Hanna (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to a fourteen (14) day extension of Plaintiff’s deadline to file an Opposition to Defendants Mark Broadhurst’s and Chase Swanson’s Motions to Dismiss (ECF No. 60 + 61) and a twenty-one (21) day extension of Defendants’ deadline to file a Reply to Plaintiff’s Opposition, as follows:

	Old Deadline	New Deadline
Plaintiff's Opposition Deadline	April 4, 2022	April 18, 2022
Defendant's Reply Deadline	April 11, 2022	May 2, 2022

26 This is the second request for an extension of these deadlines. The requested extension is
27 sought in good faith and not for purposes of undue delay.

1 **GOOD CAUSE FOR EXTENSION OF DEADLINES**

2 This extension is necessitated by the withdrawal of Plaintiff's counsel Kathryn Black from this
3 matter. As Ms. Black was the lead attorney representing Plaintiff, her departure from Gilbert
4 Employment Law P.C. will result in the reassignment of her case responsibilities, which include
5 preparing Plaintiff's Oppositions to the Motions to Dismiss filed by Defendants Broadhurst and
6 Swanson. A two-week extension would allow Plaintiff's counsel to reassign her responsibilities
7 appropriately and with consideration for the heavy litigation schedule faced by the remainder of
8 Plaintiff's counsel over the next few weeks.
9

10 Respectfully submitted,

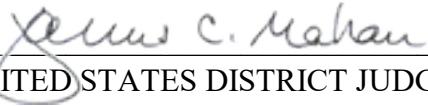
11 DATED 3/30/2022

12 _____
13 */s/ Gary Gilbert*
14 Gary M. Gilbert, Esq.
15 *Pro Hac Vice*
16 Attorney for Plaintiff
17

18 _____
19 */s/ Scott Mahoney*
20 Scott M. Mahoney, Esq.
21 Nevada Bar No. 1099
22 Attorney for Defendant
23

24 **ORDER**

25 IT IS SO ORDERED.

26 
27 _____
28 UNITED STATES DISTRICT JUDGE

29 Dated: March 31, 2022 _____
30